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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARIO ABREGO,

Defendant.

Case No.: 2:18-cr-00223-APG-DJA

**ORDER TO CONTINUE THE
HEARING RE: MOTION TO DISMISS
COUNSEL
(First Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between CHRISTOPHER CHIOU, Acting United States Attorney, and SHAHEEN TORGOLEY, Assistant United States Attorney, counsel for the United States of America, and SHAWN PEREZ, counsel for Defendant MARIO ABREGO, that the hearing regarding defendant's [53] Motion to Dismiss counsel in the above-captioned matter, currently scheduled for August 18, 2021, at 1:00 p.m., be vacated and continued to August 23, 2021, at a time to be set by this Honorable Court.

This stipulation is entered into for the following reasons:

1. Today, the Court set a hearing for Mr. Abrego's motion to dismiss counsel for August 18, 2021. Trial is set for November 29, 2021.

2. Government counsel, Assistant United States Attorney Shaheen Torgoley anticipates being out of office from August 18, 2021 through August 20, 2021.

3. Mr. Abrego's present counsel, Shawn Perez, is available on August 23, 2021.

4. The parties agree to the continuance.

5. Defendant MARIO ABREGO is in custody and does not object to the continuance.

6. The additional time requested by this stipulation, is allowed, with the defendant's consent under the Federal Rules of Procedure 5.1(d).

7. This is the first request for a continuation of the hearing regarding defendant's [53] Motion to Dismiss counsel.

DATED: August 5, 2021

Respectfully submitted,

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Shaheen Torgoley

SHAHEEN TORGOLEY
Assistant United States Attorney

/s/ Shawn Perez

SHAWN PEREZ
Counsel for Defendant MARIO ABREGO

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARIO ABREGO,

Defendant.

Case No.: 2:18-cr-00223-APG-DJA

ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Plaintiff's counsel, Assistant United States Attorney Shaheen Torgoley will be out of district from August 18, 2021 through August 20, 2021.

2. A trial date complying with Speedy Trial Act parameters is set for November 29, 2021.

3. Defendant MARIO ABREGO is in custody and does not object to the continuance.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

5. The additional time requested by this stipulation, is allowed, with the defendant's consent under the Federal Rules of Procedure 5.1(d).

6. This is the first request for a continuation of the hearing regarding defendant's [53] Motion to Dismiss counsel.

For all of the above-stated reasons, the ends of justice would best be served by a continuance of the hearing regarding defendant's [53] Motion to Dismiss counsel.

ORDER

IT IS THEREFORE ORDERED that the hearing regarding defendant's [53] Motion to Dismiss counsel currently scheduled for August 18, 2021, at the hour of 1:00 p.m., be vacated and continued to August 23, 2021, at the hour of 11:00 a.m. via video conference.

The parties will receive a zoom invitation to appear.

DATED this 6th day of August, 2021.



THE HONORABLE DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE